

16TH JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. MARTIN
STATE OF LOUISIANA

NO. 91312

DIVISION "6"

CEDRIC BABINEAUX

VERSUS

TRISURA SPECIALTY INSURANCE COMPANY,
RAPID LEASING TRUCKING, LLC and ALEJANDRO ESCOBAR, JR.

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, comes plaintiff, CEDRIC BABINEAUX, a person of the full age of majority, and current resident and domiciliary of St. Martin Parish, Louisiana, who respectfully represents the following:

1.

Made defendants herein are:

- A. TRISURA SPECIALTY INSURANCE COMPANY, a foreign insurance company authorized to do and doing business in the State of Louisiana, which may be served through its registered agent for service of process, Louisiana Secretary of State, 8585 Archives Avenue, Baton Rouge, Louisiana 70809;
- B. RAPID LEASING TRUCKING, LLC, a Texas limited liability company authorized to do and doing business in the State of Louisiana, which may be served through the Louisiana Long Arm Statute, through its registered agent for service of process Texas Secretary of State, Service of Process, P.O. Box 12079, Austin, Texas 78711-2079; and
- C. ALEJANDRO ESCOBAR, JR., a person of the full age of majority and resident of County of Hidalgo, City of Mission, Texas, who can be served through the Louisiana Long Arm Statute at 1803 Perkins, Mission, Texas 78572.

2.

Defendants, TRISURA SPECIALTY INSURANCE COMPANY, RAPID LEASING TRUCKING, LLC and ALEJANDRO ESCOBAR, JR. are liable unto plaintiff *in solido* for the full sum of the amount of damages reasonable in the premises to be proven at the trial on the merits, plus interest from the date of judicial demand until paid, and for all costs of these proceedings and for all general and equitable relief that plaintiff is entitled to for the following to-wit:

3.

On or about February 4, 2021, plaintiff, CEDRIC BABINEAUX, was the permitted operator of a 2018 Kenworth 18 wheeler, owned by Mouton Plumbing and Hauling, Inc., and was stopped eastbound on I-10 near milepost 109.2 near Highway 328 in St. Martin Parish, Louisiana.

4.

At or about that same time, defendant, ALEJANDRO ESCOBAR, JR., was the permitted operator of a 2017 Peterbilt 18 wheeler, owned by RAPID LEASING TRUCKING, LLC, and was

traveling eastbound on I-10 near milepost 109.2 near Highway 328 in St. Martin Parish, Louisiana when he slowed his vehicle due to traffic congestion, when suddenly, violently, and without warning, defendant, ALEJANDRO ESCOBAR, JR., crashed into the rear of the vehicle being driven by CEDRIC BABINEAUX.

5.

A legal cause of the collision sued on herein was the negligence of defendant, ALEJANDRO ESCOBAR, JR., which negligence consisted more particularly of the following:

- a. Following too closely, in violation of La. R.S. 32:81;
- b. Failing to be attentive and/or observe surrounding traffic;
- c. Driving a vehicle in an unsafe, reckless and dangerous manner;
- d. Operating the vehicle under his control in a careless manner, in violation of La. R.S. 32:58;
- e. Failing to see what should have been seen;
- f. Failing to stop; and
- g. Failure to keep vehicle under proper control.

6.

A legal cause of the collision sued on herein was the negligence of defendant, RAPID LEASING TRUCKING, LLC, of which negligence consisted more particularly of the following:

- a. Negligently entrusting their vehicle to an unskilled driver; and
- b. Failure to supervise those operating their vehicle.

7.

On or about February 4, 2021, at the time of the accident sued upon herein, plaintiff alleges upon information and belief that there was in full force and effect, one or more policies of public motor vehicle liability insurance issued by TRISURA SPECIALTY INSURANCE COMPANY to and/or in favor of RAPID LEASING TRUCKING, LLC and/or ALEJANDRO ESCOBAR, JR. which policy(s) afford(s) coverage for the liability of the nature asserted herein, and which insurance inures to the benefit of plaintiff under the provisions of the Louisiana Direct Action Statute, La. R.S. 22:1269, thereby entitling plaintiff to maintain this direct action against said defendant insurer and thereby rendering said defendant insurer liable *in solido*, with defendants, RAPID LEASING TRUCKING, LLC, and/or ALEJANDRO ESCOBAR, JR. for damages as sued for herein.

8.

The collision of February 4, 2021, is inexplicable without resort to the presumption of negligence and the applicability of the doctrine of *res ipsa loquitur* in view of the fact that the vehicle

being operated by ALEJANDRO ESCOBAR, JR., crashed his vehicle in into the rear of plaintiff, and therefore failed to obey the traffic ordinances of the State of Louisiana, which presumptions and doctrine are specifically invoked by plaintiff herein.

9.

Upon information and belief, it is alleged that at the time of the accident, ALEJANDRO ESCOBAR, JR. was acting in the course and scope of his employment with his employer, RAPID LEASING TRUCKING, LLC. Accordingly, under the doctrine of *respondeat superior*, ALEJANDRO ESCOBAR, JR.'s employer, RAPID LEASING TRUCKING, LLC, is vicariously liable for the negligent acts of ALEJANDRO ESCOBAR, JR. Said doctrine is specifically invoked by plaintiff herein.

10.

As a result of the collision on February 4, 2021, sued on herein, plaintiff, CEDRIC BABINEAUX, suffered personal injuries and damages, which include:

- a. Injuries to the head;
- b. Injuries to the neck;
- c. Injuries to the chest;
- d. Injuries to the left shoulder;
- e. Injuries to his arms, legs, and extremities;
- f. Injuries to the back;
- g. Sprained and strained muscles, tendons and ligaments of the body and/or other injuries to be determined.

11.

Accordingly, CEDRIC BABINEAUX itemizes recoverable damages as follows:

- a. Physical pain and suffering past, present and future;
- b. Mental pain, anguish and distress past, present and future;
- c. Loss of enjoyment of life past, present and future;
- d. Loss of consortium, household services and society;
- e. Impairment;
- f. Loss of income, past, present and future;
- g. Loss of earning capacity; and
- h. Medical expenses past, present and future.

12.

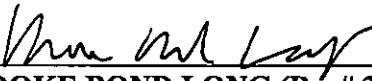
Plaintiff's cause of action exceeds the jury threshold of \$10,000.00, exclusive of interest and cost.

WHEREFORE, plaintiff prays that defendants be duly served with a copy of the Petition for Damages, and after all legal delays and due proceedings had, there be judgment in favor of plaintiff, CEDRIC BABINEAUX, and against defendants, TRISURA SPECIALTY INSURANCE COMPANY, RAPID LEASING TRUCKING, LLC, and ALEJANDRO ESCOBAR, JR., jointly, severally, and *in solido*, for compensatory damages and special damages in an amount that will adequately satisfy the demands of justice, together with legal interest thereon from the date of judicial demand until paid.

Plaintiff further prays for all costs of these proceedings and for any other relief to which plaintiff is entitled under law and evidence.

Respectfully submitted,

LABORDE EARLES LAW FIRM, LLC



BROOKE BOND LONG (Bar# 35665)

Email: service@onmyside.com

MARY K. CRYAR (Bar# 24062)

SCOTT F. HIGGINS (Bar # 20907)

DERRICK G. EARLES (Bar# 29570)

DAVID C. LABORDE (Bar# 20907)

1901 Kaliste Saloom Rd. (70508)

P.O. Box 80098

Lafayette, Louisiana 70598-0098

Phone (337) 261-2617

Fax (337) 261-1934

Attorneys for plaintiff, Cedric Babineaux

Disclaimer: For all non-service-related emails/correspondence please use the following e-mail address:
Brooke Bond Long - brooke@onmyside.com

PLEASE SERVE:

TRISURA SPECIALTY INSURANCE COMPANY
through its registered agent for service of process
Louisiana Secretary of State
8585 Archives Avenue
Baton Rouge, Louisiana 70809

RAPID LEASING TRUCKING, LLC
through the Louisiana Long Arm Statute
through its registered agent for service of process
Texas Secretary of State
Service of Process
P.O. Box 12079
Austin, Texas 78711-2079

ALEJANDRO ESCOBAR, JR.
through the Louisiana Long Arm Statute
1803 Perkins Avenue
Mission, Texas 78572

RECEIVED AND FILED

JAN 31 2022

JUSTICE PUFF
DEPUTY CLERK OF COURT
ST. MARTIN PARISH

16TH JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. MARTIN
STATE OF LOUISIANA

NO. 91312

DIVISION "G"

CEDRIC BABINEAUX

VERSUS

TRISURA SPECIALTY INSURANCE COMPANY,
RAPID LEASING TRUCKING, LLC and ALEJANDRO ESCOBAR, JR.

REQUEST FOR NOTICE OF TRIAL, HEARINGS & ORDERS

In accordance with the provisions of Louisiana Code of Civil Procedure Annotated art 1572, plaintiff request you to send to CEDRIC BABINEAUX, through the undersigned counsel, written notice of the date assigned by the court for trial on the merits as well as the date set for the hearing and/or trial of any and all motions, pleadings and other matters, at least 10 days in advance of the same, and written notice of the signing of any final judgment and/or the rendition of any interlocutory order or judgment, as provided for in Louisiana Code of Civil Procedure Annotated Articles 1913 to 1914 for the above numbered cause.

Respectfully submitted,

LABORDE EARLES LAW FIRM, LLC

Brooke Bond Long
BROOKE BOND LONG (Bar# 35665)
Email: service@onmyside.com
MARY K. CRYAR (Bar# 24062)
SCOTT F. HIGGINS (Bar # 20907)
DERRICK G. EARLES (Bar# 29570)
DAVID C. LABORDE (Bar# 20907)
1901 Kaliste Saloom Rd. (70508)
P.O. Box 80098
Lafayette, Louisiana 70598-0098
Phone (337) 261-2617
Fax (337) 261-1934
Attorneys for plaintiff, Cedric Babineaux

Disclaimer: For all non-service-related emails/correspondence please use the following e-mail address: Brooke Bond Long - brooke@onmyside.com

RECEIVED AND FILED

JAN 3 1 2022
Kristen Dugay
DEPUTY CLERK OF COURT
ST. MARTIN PARISH

CITATION**BABINEAUX, CEDRIC****Versus****TRISURA SPECIALTY INSURANCE COMPANY -
ET AL****Case: 091312****Division: G****16th Judicial District Court****Parish of St. Martin****State of Louisiana****TO:**

**TRISURA SPECIALTY INSURANCE COMPANY
THROUGH ITS REGISTERED AGENT FOR SERVICE OF PROCESS
LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVE.
BATON ROUGE, LA 70809**

of EAST BATON ROUGE Parish, Louisiana.

You are hereby summoned to comply with the demand contained in the PETITION FOR DAMAGES of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance, either by filing a pleading or otherwise, in the 16th Judicial District Court in and for the Parish of St. Martin, State of Louisiana, within twenty-one (21) days after the service hereof, under penalty of default.

WITNESS MY OFFICIAL HAND AND SEAL OF OFFICE AT ST. MARTINVILLE, LOUISIANA, on this 1ST day of FEBRUARY, 2022.

BECKY P. PATIN
*Clerk of the 16th Judicial District Court for
St. Martin Parish, Louisiana*

Kristie Prejean
BY: _____

Deputy Clerk of Court

REQUESTED BY:
BROOKE BOND LONG
ATTORNEY FOR CEDRIC BABINEAUX

Service Information

Received on the _____ day of _____, 20____ and on the _____ day of _____, 20____ served the above-named party as follows:

*Personal Service on the party herein named _____.
Domiciliary Service on the party herein named by leaving the same at his/her domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his/her residence at the time of said service.*

Returned:

Parish of _____ this _____ day of _____, 20_____.

Service \$ _____

By: _____

Mileage \$ _____

Deputy Sheriff

Total \$ _____

[FILE]

TO: Sheriff FROM: Becky P. Patin

East Baton Rouge Parish Clerk of Court, St. Martin Parish

P. O. Box 3277 P. O. Box 308, St. Martinville, LA 70582

Baton Rouge, LA 70821-3277 Phone: 337-394-2210 Fax: 337-394-2240

RE: SUIT NO. 91312-G PROBATE NO.

CEDRIC BABINEAUX

VS.

TRISURA SPECIALTY INS. CO., ET AL

I AM ENCLOSING 1 CITATION ALONG WITH A TRUE COPY OF PETITION FOR
DAMAGES FOR SERVICE ON TRISURA SPECIALTY INSURANCE COMPANY THROUGH
SECRETARY OF STATE. I AM ENCLOSING 2 CHECKS, ONE CHECK IN THE AMOUNT OF \$
39.36 AND ANOTHER CHECK IN THE AMOUNT OF \$50.00.

Date of Notice February 1, 2022

Kristie Prejean
Deputy Clerk of Court

CITATION**BABINEAUX, CEDRIC****Versus****TRISURA SPECIALTY INSURANCE COMPANY -
ET AL****Case: 091312****Division: G****16th Judicial District Court****Parish of St. Martin****State of Louisiana****TO:**

**RAPID LEASING TRUCKING LLC
THROUGH THE LOUISIANA LONG ARM STATUTE
THROUGH ITS REGISTERED AGENT FOR SERVICE OF PROCESS
TEXAS SECRETARY OF STATE
SERVICE OF PROCESS
P. O. BOX 12079
AUSTIN, TEXAS 78711-2079**

THROUGH THE LOUISIANA LONG ARM STATUTE

You are hereby summoned to comply with the demand contained in the PETITION FOR DAMAGES of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance, either by filing a pleading or otherwise, in the 16th Judicial District Court in and for the Parish of St. Martin, State of Louisiana, within THIRTY (30) days after the service hereof, under penalty of default.

WITNESS MY OFFICIAL HAND AND SEAL OF OFFICE AT ST. MARTINVILLE, LOUISIANA, on this 1ST day of FEBRUARY, 2022.

**BECKY P. PATIN
Clerk of the 16th Judicial District Court for
St. Martin Parish, Louisiana**

Kristie Prejean
BY: _____

Deputy Clerk of Court

**REQUESTED BY:
BROOKE BOND LONG
ATTORNEY FOR CEDRIC BABINEAUX**

Service Information

Received on the _____ day of _____, 20____ and on the _____ day of _____, 20____ served the above-named party as follows:

Personal Service on the party herein named _____.
Domiciliary Service on the party herein named by leaving the same at his/her domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his/her residence at the time of said service.

**Returned:
Parish of _____ this _____ day of _____, 20_____.**

**Service \$ _____
By: _____**

**Mileage \$ _____
Deputy Sheriff**

Total \$ _____

CITATION**BABINEAUX, CEDRIC****Versus****TRISURA SPECIALTY INSURANCE COMPANY -
ET AL****Case: 091312****Division: G****16th Judicial District Court****Parish of St. Martin****State of Louisiana****TO:**

**ALEJANDRO ESCOBAR JR
THROUGH THE LOUISIANA LONG ARM STATUTE
1803 PERKINS AVE.
MISSION, TEXAS 78572**

THROUGH THE LOUISIANA LONG ARM STATUTE

You are hereby summoned to comply with the demand contained in the PETITION FOR DAMAGES of which a true and correct copy (exclusive of exhibits) accompanies this citation, or make an appearance, either by filing a pleading or otherwise, in the 16th Judicial District Court in and for the Parish of St. Martin, State of Louisiana, within THIRTY (30) days after the service hereof, under penalty of default.

WITNESS MY OFFICIAL HAND AND SEAL OF OFFICE AT ST. MARTINVILLE, LOUISIANA, on this 1ST day of FEBRUARY, 2022.

**BECKY P. PATIN
Clerk of the 16th Judicial District Court for
St. Martin Parish, Louisiana**

Kristie Prejean
BY: _____

Deputy Clerk of Court

**REQUESTED BY:
BROOKE BOND LONG
ATTORNEY FOR CEDRIC BABINEAUX**

Service Information

Received on the _____ day of _____, 20____ and on the _____ day of _____, 20____ served the above-named party as follows:

*Personal Service on the party herein named _____.
Domiciliary Service on the party herein named by leaving the same at his/her domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his/her residence at the time of said service.*

*Returned:
Parish of _____ this _____ day of _____, 20____.*

<i>Service</i>	<i>\$ _____</i>	<i>By:</i> _____
<i>Mileage</i>	<i>\$ _____</i>	<i>Deputy Sheriff</i>
<i>Total</i>	<i>\$ _____</i>	

TO: BROOKE BOND LONG FROM: Becky P. Patin
ATTORNEY AT LAW Clerk of Court, St. Martin Parish
P. O. BOX 80098 P. O. Box 308, St. Martinville, LA 70582
LAFAYETTE, LA 70598 Phone: 337-394-2210 Fax: 337-394-2240

RE: SUIT NO. 91312-G PROBATE NO. _____

CEDRIC BABINEAUX

VS.

TRISURA SPECIALTY INS. CO., ET AL

I AM ENCLOSING 2 CITATION ALONG WITH 2 TRUE COPIES OF PETITION FOR
DAMAGES FOR SERVICES ON RAPID LEASING TRUCKING LLC THROUGH TEXAS
SECRETARY OF STATE THROUGH THE LOUISIANA LONG ARM STATUTE AND ALEJANDRO
ESCOBAR, JR. THROUGH THE LOUISIANA LONG ARM STATUTE.

Date of Notice February 1, 2022

Kristie Prejean
Deputy Clerk of Court

CITATION FOR PETITION

BABINEAUX, CEDRIC

Versus

TRISURA SPECIALTY INSURANCE COMPANY -
ET AL

Case: 091312

Division: G

16th Judicial District Court

Parish of St. Martin

State of Louisiana

To: RAPID LEASING TRUCKING LLC
 THROUGH THE LOUISIANA LONG ARM STATUTE
 THROUGH ITS REGISTERED AGENT FOR SERVICE OF PROCESS
 TEXAS SECRETARY OF STATE
 P. O. BOX 12079
 AUSTIN, TEXAS 78711-2079

You are named as a defendant in the above captioned matter. Attached to this citation is a:

- Certified Copy of Original Petition
 Certified Copy of Amended Petition
 Discovery Request

You must either comply with the demand contained in the petition or make an appearance either by filing an answer or other pleading in the 16th Judicial District Court located at 415 Saint Martin St, Saint Martinville, LA 70582 within the delay provided in Article 1001 of the Louisiana Code of Civil Procedure under penalty of default.

Article 1151 of the Louisiana Code of Civil Procedure provides in pertinent part:

A defendant shall plead in response to an Amended Petition within the time remaining for pleading to the Original Pleading or with ten (10) days after service of the Amended Petition, whichever period is longer, unless the time is extended under Article 1001.

Article 1001 of the Louisiana Code of Civil Procedure states:

- A. A defendant shall file his answer within **thirty (30) days** after service of Citation upon him, except as otherwise provided by law. If the plaintiff files and serves a Discovery Request with his Petition, the defendant shall file his answer to the petition within **thirty (30) days** after service of the amended petition.
- B. When an Exception is filed prior to Answer and is overruled or referred to the merits, or is sustained and an Amendment of the Petition ordered, the Answer shall be filed within fifteen (15) days after the exception is overruled or referred to the merits, or fifteen (15) days after service of the Amended Petition.
- C. The Court may grant additional time for answering.

THE CLERK OF COURT'S STAFF CANNOT PROVIDE LEGAL ADVICE.

This Citation was issued by the Clerk for the Court for the 16th Judicial District Court, Parish of St. Martin, on the 3rd day of MARCH, 2022.

A handwritten signature in black ink that reads "Kristie Prejean".

Deputy Clerk of Court

Requested by Attorney:

MARY K. CRYAR

Service Information

Received on the _____ day of _____, 20____ and on the _____ day of _____, 20____ served the above-named party as follows:

Personal Service on the party herein named _____.
Domiciliary Service or Departmental Service on the party herein named by leaving the same at his/her domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his/her residence at the time of said service.

Returned:

Parish of _____ this _____ day of _____, 20_____.

Service \$ _____

By: _____ Deputy Sheriff

Mileage \$ _____

Total \$ _____

[FILE]

CITATION FOR PETITION

BABINEAUX, CEDRIC

Versus

TRISURA SPECIALTY INSURANCE COMPANY -
ET AL

Case: 091312

Division: G

16th Judicial District Court

Parish of St. Martin

State of Louisiana

To: ALEJANDRO ESCOBAR JR
 THROUGH THE LOUISIANA LONG ARM STATUTE
 1803 PERKINS AVE.
 MISSION, TEXAS 78572

You are named as a defendant in the above captioned matter. Attached to this citation is a:

- Certified Copy of Original Petition
- Certified Copy of Amended Petition
- Discovery Request

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- B. When an Exception is filed prior to Answer and is overruled or referred to the merits, or is sustained and an Amendment of the Petition ordered, the Answer shall be filed within fifteen (15) days after the exception is overruled or referred to the merits, or fifteen (15) days after service of the Amended Petition.
- C. The Court may grant additional time for answering.

THE CLERK OF COURT'S STAFF CANNOT PROVIDE LEGAL ADVICE.

This Citation was issued by the Clerk for the Court for the 16th Judicial District Court, Parish of St. Martin, on the 3rd day of MARCH, 2022.

A handwritten signature in black ink that reads "Kristie Prejean".

Deputy Clerk of Court

Requested by Attorney:
 MARY K. CRYAR

Service Information

Received on the _____ day of _____, 20____ and on the _____ day of _____, 20____ served the above-named party as follows:

Personal Service on the party herein named _____
Domiciliary Service or Departmental Service on the party herein named by leaving the same at his/her domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his/her residence at the time of said service.

Returned:

Parish of _____ this _____ day of _____, 20_____.

Service \$ _____

By: _____ Deputy Sheriff

Mileage \$ _____

Total \$ _____

ATTORNEY AT LAW

P. O. BOX 80098

LAFAYETTE, LA 70598

FROM: Becky P. Patin

Clerk of Court, St. Martin Parish

P. O. Box 308, St. Martinville, LA 70582

Phone: 337-394-2210 Fax: 337-394-2240

RE: SUIT NO. 91312-G

PROBATE NO. _____

CEDRIC BABINEAUX

VS.

TRISURA SPECIALTY INSURANCE
COMPANY, ET AL

I AM ENCLOSING 2 CITATION FOR PETITION ALONG WITH 2 TRUE COPIES OF
PETITION FOR DAMAGES FOR SERVICES ON RAPID LEASING TRUCKING, LLC THROUGH
TEXAS SECRETARY OF STATE THROUGH THE LOUISIANA LONG ARM STATUTE AND
ALEJANDRO ESCOBAR, JR. THROUGH THE LOUISIANA LONG ARM STATUTE.

Becky P. Patin
Clerk of Court
P.O. Box 308
St. Martinville, La. 70582

Ph. #337/394-2210
Fax. #337/394-2240

NEW CIVIL SUIT FILING CERTIFICATION

STATE OF LOUISIANA
PARISH OF ST. MARTIN

TO:
BROOKE BOND LONG
ATTORNEY AT LAW
P. O. BOX 80098
LAFAYETTE, LA 70598

THIS CERTIFIES THAT ON THE 26TH DAY OF JANUARY, 2022 THE BELOW ENTITLED CASE HAS BEEN FILED FOR RECORD IN THIS OFFICE.

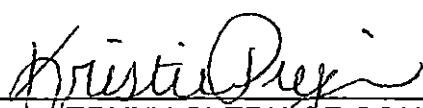
CEDRIC BABINEAUX

VS. # 91312

TRISURA SPECIALTY INSURANCE COMPANY, ET AL

DIVISION G

JUDGE CURTIS SIGUR



DEPUTY CLERK OF COURT
ST. MARTIN PARISH

FAX CONFIRMATION**BABINEAUX, CEDRIC****Versus****TRISURA SPECIALTY INSURANCE COMPANY -
ET AL****Case: 091312****Division: G****16th Judicial District Court****Parish of St. Martin****State of Louisiana****Tax ID # 726001272**

**YOU ARE HEREBY INFORMED BY THIS FAX CONFIRMATION NOTICE THAT THE FOLLOWING HAS
BEEN FILED BY FACSIMILE.**

DATE FAX TRANSMISSION RECEIVED: 1.26.22DESCRIPTION OF TRANSMISSION: Damages

FILED ON BEHALF OF: _____

PERSON SIGNING PLEADING: B. Long

This is to acknowledge that the above described facsimile transmission was received and filed on the date shown above as per LA R.S. 13:850.

The original pleading is to be forwarded within SEVEN (7) days, exclusive of legal holidays, of this confirmation together with the \$5.00 transmission fee; \$15.00 fee for this confirmation (WILL BE ADDED TO AMOUNT DUE); the correct filing fee to cover the cost of filing the facsimile copy as well as the original pleading and any balance of costs due. When the original pleading is received, the file mark will indicate the actual date it is received.

The record will contain the facsimile pleading, this confirmation and the original pleading. PLEASE ADD CASE NUMBER.

BECKY P. PATIN
*Clerk of the 16th Judicial District Court for
 St. Martin Parish, Louisiana*

BY:

Deputy Clerk of Court

Confirmation faxed to number: 261.1934

Date confirmation faxed: 1.26.22

Amount due: \$715.00

[FILE]

1901 Kaliste Saloom Rd. (70508)
 P.O. Box 80098 (70598-0098)
 Lafayette, Louisiana



Phone (337) 261-2617
 (800) 522-6733
 Fax (337) 261-1934

DIRECT DIAL: (337) 703-0828
 BROOKE@ONMYSIDE.COM

LABORDE EARLES

INJURY LAWYERS

January 25, 2022

VIA FAX: (337) 394-2240 AND U.S. MAIL

Clerk of Court
 16th Judicial District Court
 Parish of St. Martin
 P.O. Box 308
 St. Martinville, Louisiana 70582

FILE

**Re: Cedric Babineaux v. Trisura Specialty Insurance Company, et al
 16th Judicial District Court, Parish of St. Martin**

Dear Madam/Sir:

We enclose herewith an original and five (5) copies of a Petition for Damages and Request for Notice of Trial, Hearings & Orders which we are fax filing on behalf of the plaintiff, Cedric Babineaux in the captioned matter. The original, five (5) copies, a self-addressed envelope and our firm's check to cover the costs associated with this fax filing will follow via regular U.S. Mail.

Please file the original into the court's record, serve a conformed copy upon each of the defendants at the addresses indicated on the Petition, and return a filed-stamped copy to us for our records.

Please note that defendants, Rapid Leasing Trucking, LLC and Alejandro Escobar, Jr. will be served via the Louisiana Long-Arm Service therefore, please issue two (2) Citations to Rapid Leasing Trucking, LLC and Alejandro Escobar, Jr. and return same, along with a conformed copy of the pleadings, to me for service.

Should you have any questions or comments, please do not hesitate to contact me.

With warmest regards, I remain

Sincerely,

LABORDE EARLES LAW FIRM, LLC

Brooke Bond Long

RECEIVED AND FILED

BBL/lmb
 Enclosures

JAN 31 2022
 Brooke Long
 DEPUTY CLERK OF COURT
 ST. MARTIN PARISH